

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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In re: : Chapter 11
EEG GLIDER INC.,¹ : Case No. 20-11835 (JTD)
Debtor. : Re. Docket No.
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**ORDER SUSTAINING PLAN ADMINISTRATOR'S EIGHTH
OMNIBUS OBJECTION TO CLAIMS (SUBSTANTIVE)**

Upon the objection (the “Objection”)² of Alvarez & Marsal North America, LLC, as plan administrator (the “Plan Administrator”) for the above-captioned debtors and debtors in possession (collectively, the “Debtors”) to the Disputed Claims set forth on Schedules 1, 2, and 3 hereto, all as more fully set forth in the Objection; and this Court having reviewed the Objection; and this Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that this Court may enter a final order consistent with Article III of the United States Constitution; and

¹ The last four digits of the Debtor’s federal tax identification number are 7800 and the Debtor’s address is 655 15th Street, NW, Suite 600, Washington, DC 20005. The chapter 11 cases of the following affiliates of the Debtor were closed effective as of June 9, 2021: EEG I LLC (f/k/a Airline Media Productions, Inc.) (2314), Emerging Markets Communications, LLC (0735), Entertainment in Motion, LLC (f/k/a Entertainment in Motion, Inc.) (3908), EEG 2 LLC (f/k/a Global Eagle Entertainment Operations Solutions, Inc.) (3375), Global Eagle Services, LLC (7899), Global Eagle Telecom Licensing Subsidiary LLC (2547), IFE Services (USA), LLC (f/k/a IFE Services (USA), Inc. (2120), Inflight Productions USA, LLC (f/k/a Inflight Productions USA Inc. (8493), EEG 3 LLC (f/k/a Maritime Telecommunications Network, Inc. (9974), MTN Government Services (6069), MTN International, LLC (f/k/a MTN International, Inc.) (8559), MTN License LLC (f/k/a MTN License Corp.) (0314), N44HQ, LLC (0570), EEG 4 LLC (f/k/a Post Modern Edit, Inc.) (6256), Row 44, LLC (f/k/a Row 44, Inc.) (2959), and The Lab Aero, LLC (f/k/a The Lab Aero, Inc.) (9831). See Chapter 11 Case No. 20-11835 (JTD), Docket No. 1018.

² Capitalized terms used but not otherwise defined herein have the same meanings ascribed to such terms in the Objection.

this Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Objection has been given and that no other or further notice is necessary; and upon the record herein; and after due deliberation thereon; and this Court having determined that there is good and sufficient cause for the relief granted in this Order, therefore, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Objection is GRANTED, as set forth herein.
2. Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on its merits.
3. The No Liability Claims listed on the attached Schedule 1 are disallowed and expunged in their entirety.
4. The Reduce and Allow Claims listed on the attached Schedule 2 are hereby reduced and allows in the amounts set forth on Schedule 2.
5. The Substantive Duplicate Claims listed in the column titled “Claims to be Disallowed” on the attached Schedule 3 are disallowed and expunged in their entirety. The Claims listed in the column titled “Remaining Claims” on the attached Schedule 3 shall remain on the Claims Register, unless such Claims are otherwise disallowed by this Order or another order of this Court, subject to the Plan Administrator’s further objections on any substantive or non-substantive grounds.
6. This Order shall be deemed a separate order with respect to each of the Disputed Claims identified on Schedules 1, 2, and 3 hereto. Any stay of this Order pending appeal by any of the claimants whose Disputed Claim(s) are subject to this Order shall only apply to the contested

matter which involves such claimant and shall not act to stay the applicability or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

7. The Plan Administrator, the Debtors, and Prime Clerk are authorized to take all actions necessary and appropriate to give effect to this Order.

8. Prime Clerk is authorized to modify the Claims Register to comport with the relief granted by this Order.

9. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Plan Administrator may have to enforce rights of setoff against the claimants.

10. Nothing in the Objection or this Order shall be deemed or construed: (a) as an admission as to the validity of any Claim or Interest against the Debtors; (b) as a waiver of the Plan Administrator's rights to dispute or otherwise object to any Claim or Interest on any grounds or basis; (c) to waive or release any right, claim, defense, or counterclaim of the Debtors, or to estop the Plan Administrator from asserting any right, claim, defense, or counterclaim; (d) as an approval or assumption of any agreement, contract, or lease, pursuant to section 365 of the Bankruptcy Code; or (e) as an admission that any obligation is entitled to administrative expense priority or any such contract or agreement is executory or unexpired for purposes of section 365 of the Bankruptcy Code or otherwise.

11. The terms and conditions of this Order shall be immediately enforceable and effective upon its entry.

12. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

SCHEDULE 1

No Liability Claims

Global Eagle Entertainment Inc. 20-11835 (JTD)
No Liability Claims

NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT	REASON FOR SATISFACTION
1 FRANCHISE TAX BOARD BANKRUPTCY SECTION MS A340 PO BOX 2952 SACRAMENTO, CA 95812-2952	1/14/2021	20-11835 (JTD)	Global Eagle Entertainment Inc.	605	Undetermined*	No liability exists on the Debtor's books and records.
2 NEW YORK STATE DEPARTMENT OF TAXATION AND FINANCE BANKRUPTCY SECTION PO BOX 5300 ALBANY, NY 12205-0300	1/15/2021	20-11835 (JTD)	Global Eagle Entertainment Inc.	610	\$ 12,522.92	Debtor's confirmed with taxing authority on 6/10/21 that asserted liability owed for 2019-2020 payroll taxes has been resolved.
3 NJ UNCLAIMED PROPERTY ADMINISTRATION PO BOX 214 TRENTON, NJ 08625-0214	1/7/2021	20-11835 (JTD)	Global Eagle Entertainment Inc.	594	Undetermined*	No liability exists on the Debtor's books and records.
TOTAL					\$ 12,522.92*	

SCHEDULE 2

Reduce and Allow Claims

NAME	CLAIM#	ASSERTED			CORRECTED		
		DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
1 CISCO SYSTEMS CAPITAL CORPORATION WHITE AND WILLIAMS LLP ATTN: MARC S. CASARINO 600 N. KING STREET, SUITE 800 WILMINGTON, DE 19801	660	Global Eagle Entertainment Inc.	Administrative	\$67,917.25	Global Eagle Entertainment Inc.	Administrative	\$51,815.18
Reason: Post-petition invoices have been satisfied in the ordinary course by payment #128575 dated 10/23/20 and payment #132837 dated 2/12/21.							
Debtor's books and records reflect a remaining liability of \$51,815.18 for invoices #657801 and #692848.							
2 COUNTY OF ORANGE PO BOX 4515 SANTA ANA, CA 92702	556	Post Modern Edit, Inc. Post Modern Edit, Inc.	Priority Unsecured	Undetermined* \$1,298.21*	Post Modern Edit, Inc.	Unsecured	\$1,298.21
Reason: Debtors' books and records reflect the liquidated value of the filed claim.							
3 FRANCHISE TAX BOARD BANKRUPTCY SECTION MS A340 PO BOX 2952 SACRAMENTO, CA 95812-2952	606	Global Eagle Entertainment Operations Solutions, Inc. Global Eagle Entertainment Operations Solutions, Inc.	Priority Unsecured	\$826.58* \$1,187.00*	Global Eagle Entertainment Operations Solutions, Inc. Global Eagle Entertainment Operations Solutions, Inc.	Priority Unsecured	\$826.58 \$1,187.00
Reason: Debtors' books and records reflect the liquidated value of the filed claim.							
4 IRS 31 HOPKINS PLAZA ROOM 1150 BALTIMORE, MD 21201	199	Emerging Markets Communications, LLC	Unsecured	\$14,559.44*	Emerging Markets Communications, LLC	Unsecured	\$14,559.44
Reason: Debtors' books and records reflect the liquidated value of the filed claim.							
5 IRS 31 HOPKINS PLAZA ROOM 1150 BALTIMORE, MD 21201	642	IFE Services (USA), Inc. IFE Services (USA), Inc.	Priority Secured	Undetermined* \$91.90*	IFE Services (USA), Inc.	Secured	\$91.90
Reason: Debtors' books and records reflect the liquidated value of the filed claim.							

6	LOS ANGELES COUNTY TREASURER 548 AND TAX COLLECTOR PO BOX 54110 LOS ANGELES, CA 90054-0110	Global Eagle Entertainment Inc.	Secured	\$166.57*	Global Eagle Entertainment Inc.	Secured	\$166.57
		Global Eagle Entertainment Inc.	Unsecured	\$67.16*	Global Eagle Entertainment Inc.	Unsecured	\$67.16
		Subtotal		\$233.73*	Subtotal		\$233.73

Reason: Debtors' books and records reflect the liquidated value of the filed claim.

TOTAL	\$ 86,114.11*	TOTAL	\$ 70,012.04
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SCHEDULE 3

Substantive Duplicate Claims

Global Eagle Entertainment Inc. 20-11835 (JTD)
Substantive Duplicate Claims

<u>CLAIMS TO BE DISALLOWED</u>					<u>REMAINING CLAIMS</u>				
NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1 CISCO SYSTEMS CAPITAL CORPORATION C/O LAWRENCE M. SCHWAB / KENNETH T. LAW BIALSON, BERGEN & SCHWAB 633 MENLO AVENUE, SUITE 100 MENLO PARK, CA 94025	08/21/20	Emerging Markets Communications, LLC 20-11837 (JTD)	91	\$ 239,566.26*	CISCO SYSTEMS CAPITAL CORPORATION WHITE AND WILLIAMS LLP ATTN: MARC S. CASARINO 600 N. KING STREET, SUITE 800 WILMINGTON, DE 19801	04/30/21	Global Eagle Entertainment Inc. 20-11835 (JTD)	660	\$ 67,917.25

Reason: Liability asserted in Proof of Claim is a substantive duplicate to Proof of Claim #660 which the Debtor's proposed to reduce and allow on the Eighth Omnibus Objection.